

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Swaledale Post Office
Swaledale, Iowa

Docket No. A2012-52

PUBLIC REPRESENTATIVE COMMENTS
(January 13, 2012)

The Commission received three petitions seeking review of the Postal Service's Final Determination to close the Swaledale, Iowa post office (Swaledale post office). On November 18, 2011, the Commission issued Order No. 983, which instituted this proceeding, designated the undersigned Public Representative, and established a procedural schedule.¹ In accordance with Order No. 983, the Public Representative submits the following comments to better inform the Commission in completing its review.

The record indicates that the Postal Service provided customers with adequate notice of its intent to close the Swaledale post office. The Postal Service distributed questionnaires to customers and held a community meeting to address customer concerns. Final Determination at 2. It posted the Proposal to Close and Final Determination for at least 60 days and 30 days, respectively, at the Swaledale, Rockwell, and Thornton post offices. Administrative Record, Item Nos. 36, 49.

Petitioners express concerns about the effect on postal services. They argue that closing the Swaledale post office will adversely affect senior citizens, who are unable to drive or take public transportation to the Rockwell or Thornton post offices. Groh Petition; Drury Petition at 2-3; Bonner Participant Statement at 1. They contend that the closing will cause unnecessary hardship to persons with disabilities because the Rockwell post office is not handicap accessible. *Id.*

¹ Notice and Order Accepting Appeal and Establishing Procedural Schedule, November 18, 2011 (Order No. 983).

In its comments, the Postal Service responds that special provisions are made on request for hardship cases or special customer needs. Postal Service Comments at 8. It does not dispute that the Rockwell post office is not handicap accessible, but it asserts that “rural route service effectively addresses all handicap needs.” *Id.* at 8 n.28. The Public Representative submits that the Postal Service should accommodate the needs of senior citizens and persons with disabilities to ensure that they receive effective and regular service after the closure.

Petitioners also contest the accuracy of the economic savings. They contend that the economic savings should include the salary and benefits of the OIC rather than the postmaster, who retired in 2007. Drury Petition at 2; Bonner Participant Statement at 2. The Postal Service responds that if the Swaledale post office closes, the postmaster position and corresponding salary will be eliminated. Postal Service Comments at 12. It contends that if the closure did not take place, the postmaster vacancy would have been filled by a career employee who would have been paid the salary and benefits shown in the economic savings. *Id.*

In its comments, the Postal Service appears to have addressed all major concerns expressed by Petitioners. Thus, after carefully reviewing the Final Determination, the materials in the Administrative Record, the arguments presented by Petitioners, concerns expressed by customers of the Swaledale post office, and the Postal Service’s comments, the Public Representative concludes that the Postal Service has followed applicable procedures, that the decision to close the Swaledale post office is neither arbitrary nor capricious, and that the Postal Service’s decision is supported by substantial evidence.

Respectfully submitted,

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